## COMMONWEALTH OF KENTUCKY

# RECEIVED

#### BEFORE THE PUBLIC SERVICE COMMISSION

APR - 2003

In the Matter of:

PUBLIC SERVICE
COMMISSION

APPLICATION OF KENTUCKY POWER

COMPANY D/B/A AMERICAN ELECTRIC

POWER, FOR APPROVAL, TO THE EXTENT

NECESSARY, TO TRANSFER FUNCTIONAL

CONTROL OF TRANSMISSION FACILITIES

LOCATED IN KENTUCKY TO PJM

INTERCONNECTION, L.L.C. PURSUANT

TO KRS 278.218

)

CASE NO.

)

2002-00475

# MOTION TO EXTEND DATA REQUEST RESPONSE TIME

Comes PJM Interconnection, L.L.C. (PJM) Intervenor, by counsel, Brent L. Caldwell, and hereby moves the Commission to enter an order granting it a brief extension of time to respond to certain data requests propounded to PJM at the hearing held before the Kentucky Public Service Commission on March 6, 2003.

In support of this Motion, the undersigned counsel for PJM states that since the date of the hearing, PJM's corporate staff has been working diligently to respond to the Commission's data requests within the fourteen (14) day deadline orally announced by the Chairman of the Commission at the hearing. However, PJM's staff has not been able to complete their work on the data requests by today's deadline date. In fact, some data may still not be available by the end of this week. However, PJM commits to the Commission that it will file its responses to the data requests in as complete a form as possible by the close of business on Friday, April 11, 2002, with supplementation to follow as soon as possible thereafter.

business on Friday, April 11, 2002, with supplementation to follow as soon as possible thereafter.

Wherefore, PJM, by counsel, respectfully requests the Commission to enter an order extending the time to file its response to the Commission's data request up to the close of business on Friday, April 11, 2003.

Respectfully submitted,

McBRAYER, McGINNIS, LESLIE & KIRKLAND, PLLC 201 East Main Street, Suite 1000 Lexington, Kentucky 40507 (859) 231/8780

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BY:

BRENT L. CALDWELL ATTORNEY FOR PJM

#### CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was mailed, postage prepaid, on this the 8<sup>th</sup> day of April, 2003, to the following:

Michael L. Kurtz, Esq. Boehm, Kurtz & Lowry 36 E. Seventh Street, Suite 2110 Cincinnati, Ohio 45202

Mark R. Overstreet, Esq. Stites & Harbison, PLLC P.O. Box 634 Frankfort, Kentucky 40602

Kevin F. Duffy American Electric Power Service Corporation One Riverside Plaza P.O. Box 16631 Columbus, Ohio 43216 Elizabeth E. Blackford, Esq. Assistant Attorney General Office of Rate Intervention 1024 Capital Center Drive Frankfort, Kentucky 40601

Richard G. Raff Public Service Commission of Kentucky 211 Sower Boulevard Frankfort, Kentucky 40601

and the originals deposited in the Night Drop Box on this the 8<sup>th</sup> day of April, 2003, at the following:

Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

ATTORNEY FOR PJM

### COMMONWEALTH OF KENTUCKY

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APR - 8 2003

PUBLIC SERVICE

#### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| APPLICATION OF KENTUCKY POWER      | )            |
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| POWER, FOR APPROVAL, TO THE EXTENT | )            |
| NECESSARY, TO TRANSFER FUNCTIONAL  | ) CASE NO.   |
| CONTROL OF TRANSMISSION FACILITIES | ) 2002-00475 |
| LOCATED IN KENTUCKY TO PJM         | )            |
| INTERCONNECTION, L.L.C. PURSUANT   | )            |
| TO KRS 278.218                     | )            |

#### <u>ORDER</u>

On Motion of Intervenor, PJM Interconnection, L.L.C., by Counsel, to extend the deadline in which to file responses to the Commission's data request, and the Commission being otherwise sufficiently advised,

IT IS HEREBY ORDERED that PJM Interconnection, L.L.C. is granted an extension of time up to the close of business on Friday, April 11, 2003, to file its responses to the Commission's data requests.

So ordered this \_\_\_\_ day of April, 2003.

KENTUCKY PUBLIC SERVICE COMMISSION